

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MEHRDAD ANSARI, (3),

Defendant.

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CRIMINAL NO. SA-11-CR-516-XR

GOVERNMENT'S EXPERT WITNESS NOTIFICATION

COMES NOW, the United States of America, by and through its undersigned counsel, Mark T. Roomberg, Assistant United States Attorney, and hereby files its Expert Witness Notification, and states:

Pursuant to Federal Rule of Evidence 702, 703, 704, and 705, and Federal Rule of Criminal Procedure 16, the United States hereby gives notice that it intends to call the following witness:

Oscar R. Hernandez, an expert on the intelligence analysis, hardware design, and testing of Weapons of Mass Destruction and complex radio frequency equipment, and current employee of Sandia National Laboratory, will testify as to his assessment of the usage of the parts the Defendants obtained and attempted to obtain for shipment to Iran. In summary, Mr. Hernandez will testify that from his review of many of the 105,992 parts involving 1,261 transactions parts the defendants obtained or attempted to obtain from companies worldwide, including the 599 transactions defendants conducted with 63 different United States, to be shipped by the

Defendants to Iran, that these parts had dual-use military and civilian capability and could be used in such systems as: nuclear weapons, missile guidance and development, secure tactical radio communications, offensive electronic warfare, military electronic countermeasures (radio jamming), and radar warning and surveillance systems

Mr. Hernandez's credentials and report are more fully set forth in the attached documents.

The United States requests that the defendants provide the government with reciprocal discovery, including expert witness testimony, as provided by Federal Rules of Evidence 702, 703, 705, Federal Rule of Criminal Procedure 16, and the Court's Standing Discovery Order.

Respectfully submitted,

JOHN F. BASH
United States Attorney

By: /s/
MARK T. ROOMBERG
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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day March, a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System which will transmit notification of such filing to the following CM/ECF participant:

Scott McCrum, Esquire

/s/

MARK T. ROOMBERG